

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA  
2025 JUN -9 PM 2:46  
OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROMEO EDILZAR YAXCAL-TIUL,  
a/k/a ROMEO JUAREZ LOPEZ,  
a/k/a REGINALDO CAAL-CHUB,

Defendant.

8:25CR/2D

INDICTMENT

42 U.S.C. § 408(a)(7)(B)  
18 U.S.C. § 1546(b)(2)  
18 U.S.C. § 111(a)(1)

The Grand Jury charges that

COUNT I

On or about October 2, 2024, in the District of Nebraska, the defendant, ROMEO EDILZAR YAXCAL-TIUL, a/k/a ROMEO JUAREZ LOPEZ a/k/a REGINALDO CAAL-CHUB, with intent to deceive, falsely represented a number to be the Social Security account number assigned by the Commissioner of Social Security to him, when in fact such number, ending in XXX-XX-3218, is not the Social Security account number assigned by the commissioner of Social Security to him, for purposes of obtaining any benefit to which he is not entitled and for any other purpose, to wit: to satisfy a requirement of section 274A(b) of the Immigration and Nationality Act.

In violation of Title 42, United States Code, Section 408(a)(7)(B), and subject to sentencing under Title 18.

COUNT II

On or about October 2, 2024, in the District of Nebraska, the defendant, ROMEO EDILZAR YAXCAL-TIUL, a/k/a ROMEO JUAREZ LOPEZ a/k/a REGINALDO CAAL-CHUB, for the purpose of satisfying a requirement of section 274A(b) of the Immigration and

Nationality Act, used false identification documents, to wit: a Social Security card bearing number XXX-XX-3218, and a United States Permanent Resident Card bearing number XXX-XXX-888, knowing and having reason to know that the documents were false in that they were not issued lawfully for the use of defendant, who possessed said documents.

In violation of Title 18, United States Code, Section 1546(b)(2).

COUNT III

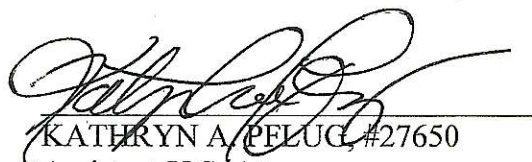
On or about June 1, 2025, in the District of Nebraska, the defendant, ROMEO EDILZAR YAXCAL-TIUL, a/k/a ROMEO JUAREZ LOPEZ a/k/a REGINALDO CAAL-CHUB, did voluntarily and intentionally forcibly resist, oppose, impede, and interfere with an officer and employee of the United States, namely Agent 1, Homeland Security Investigations Special Agent, while Agent 1 was engaged in the performance of his official duties.

In violation of Title 18, United States Code, Section 111(a)(1).

A TRUE BILL.

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FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

  
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KATHRYN A. PELUC, #27650  
Assistant U.S. Attorney